

March 8, 2021

The Honorable Jocelyn G. Boyd
Chief Clerk/Executive Director
Public Service Commission of South Carolina
101 Executive Center Drive, Suite 100
Columbia, SC 29210

Via SCPSC E-FILING DMS

**Re: Dominion Energy South Carolina, Incorporated's Annual Update on Demand
Side Management Programs and Petition to Update Rider;
Docket No. 2021-34-E**

Dear Ms. Boyd:

Please find attached for electronic filing with the South Carolina Public Service Commission ("Commission") a copy of the Petition to Intervene of Walmart Inc. ("Walmart"), in the above-referenced case. By copy of this letter, I am serving all parties of record via Electronic Mail.

Please contact us if you have any questions concerning this filing.

Sincerely,

SPILMAN THOMAS & BATTLE, PLLC

By



Stephanie U. Eaton (SC Bar No. 80073)

Derrick Price Williamson
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Counsel to Walmart Inc.

SUE/sds
Attachments
c: Certificate of Service

BEFORE THE
PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA
DOCKET NO. 2020-41-E


IN RE:)	CERTIFICATE OF SERVICE
)	
Dominion Energy South Carolina,)	
Incorporated's 2020 Annual Update on)	
Demand Side Management Programs and)	
Petition for an Update to Rate Rider)	

I hereby certify that I have this day served one (1) copy of the foregoing document upon the following parties to this proceeding via Electronic Mail:

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Stephanie U. Eaton (SC Bar No. 80073)

Dated: March 8, 2021

BEFORE THE
PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA
DOCKET NO. 2021-34-E

IN RE:)	PETITION TO INTERVENE OF
)	WALMART INC.
Dominion Energy South Carolina,)	
Incorporated's Annual Update on Demand)	
Side Management Programs and Petition)	
to Update Rider)	

Pursuant to Rule 103-825 of the rules and regulations of the South Carolina Public Service Commission ("Commission"), Walmart Inc. ("Walmart"), by its attorneys, respectfully requests that the Commission permit it to intervene and become a party in the above-captioned matter. In support of its Petition to Intervene, Walmart submits as follows:

1. On January 29, 2021, Dominion Energy South Carolina, Inc. ("DESC") filed an Annual Update on Demand Side Management ("DSM") Programs and Petition to Update Rider ("Petition"). The Petition was filed pursuant to S.C. Code Ann. Section 58-37-20 (2015), S.C. Code Ann. Regs. 103-819 and 103-825 (2012), the Rules of Practice and Procedure of the Public Service Commission of South Carolina, and all other applicable law and rules.

2. Walmart is a global retailer of goods and services and also operates throughout the United States. Walmart's principal energy management office is located at 2608 SE J Street, Bentonville, Arkansas 72712.

3. Walmart has the privilege of providing its retail services in the State of South Carolina. Walmart is a large commercial customer of DESC. Walmart has approximately 41 facilities in South Carolina that are served by DESC, which include Walmart Supercenters, Sam's Clubs, and gas stations. Walmart purchases more than 125 million kWh annually from DESC.

Electricity is one of the largest operating costs faced by Walmart. As a result, any modification to DESC's electric rates and terms of service has the potential to substantially impact Walmart's operations in South Carolina. Further, Walmart is dedicated to its own investment in DSM and energy efficiency ("EE") and therefore is very interested in this case and has participated in similar cases in the past. As such, Walmart has a direct and substantial interest in the outcome of this proceeding. In addition, as a large commercial customer that purchases substantial amounts of electric and related services from DESC pursuant to multiple accounts at multiple locations, Walmart has an interest in this proceeding that is not represented by any other party.

4. The attorneys representing Walmart in this proceeding are:

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Ms. Eaton is authorized to accept service of papers in this proceeding on behalf of Walmart. Walmart also respectfully requests that Mr. Williamson be added to the service list. Walmart may cause to be filed a motion for Mr. Williamson to be admitted *pro hac vice* before this Commission, and subsequent to any Commission grant of such request, Walmart requests that Mr. Williamson be added to the official service list as an attorney authorized to accept service of papers in this proceeding.

5. This Petition to Intervene is timely filed as interventions are due by March 8, 2021, per Notice of the Commission.

WHEREFORE, Walmart respectfully requests that it be granted leave to intervene and be made a party to the above-captioned proceeding.

Respectfully submitted,

SPILMAN THOMAS & BATTLE, PLLC

By


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Counsel to Walmart Inc.

Dated: March 8, 2021